

## Division of Air Quality Permit Application Submittal

Please find attached a permit application for :

[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only):
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only):

- Type of NSR Application (check all that apply):

- ☐ Construction
- ☐ Modification
- ☐ Class I Administrative Update
- ☐ Class II Administrative Update
- ☐ Relocation
- ☐ Temporary
- ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Application:

- ☐ Title V Initial
- ☐ Title V Renewal
- ☐ Administrative Amendment\*\*
- ☐ Minor Modification\*\*
- ☐ Significant Modification\*\*
- ☐ Off Permit Change

**\*\*If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.**

- Payment Type:

- ☐ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
- ☐ Check (Make checks payable to: WVDEP – Division of Air Quality)

Mail checks to:

WVDEP – DAQ – Permitting

Attn: NSR Permitting Secretary

601 57<sup>th</sup> Street, SE

Charleston, WV 25304

**Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.**

- If the permit writer has any questions, please contact (all that apply):

- ☐ Responsible Official/Authorized Representative

- Name:
- Email:
- Phone Number:

- ☐ Company Contact

- Name:
- Email:
- Phone Number:

- ☐ Consultant

- Name:
- Email:
- Phone Number:



135 S. LaSalle Street,  
Suite 3500  
Chicago IL 60603  
T +1 312 541 4200

*Sent via Email this Date*

November 19, 2020

Attn: Steve Pursley  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street, SE  
Charleston, WV 25304

RE: Latham Pool Products, Inc. – Jane Lew  
Application for Reg. 13/30 Amendments for RC-RTO Installation  
R13-2332G / R30-04100045-2017(MM01)

Dear Mr. Pursley:

Consistent with the Division of Air Quality (DAQ) guidance during the Covid-19 pandemic, RPS is submitting via email the attached combined Reg. 13 and Reg. 30 Modification Amendment application on behalf of the Jane Lew facility of Latham Pool Products, Inc. (Latham).

Latham is requesting two anticipated facility and operational changes to be reflected in modified Reg. 13 and Reg. 30 permits.

1. Latham intends to construct a curing room, which will adjoin the Pool Production building. There will essentially be no emissions attributable to the new curing room.
2. A rotary concentrator and regenerative thermal oxidizer (RC-RTO) will be installed to abate VOC emissions from gelcoat and vinyl ester resin application for EU-1B (Pool Production). General purpose polyester resin emissions will not be controlled by the new RC-RTO. This will require the construction of a dividing wall within the Pool Production Building to allow such emissions to be separately captured. There will be no net change in EU-1B and facility-wide VOC emission limits.

Latham would like permit language that allows the operational flexibility to have emissions from gelcoat and vinyl ester resin application to be released to the atmosphere uncontrolled, effectively by-passing the RC-RTO, when it is economically and operationally beneficial startup, operate, and/or shutdown the new control device.

Latham has not yet chosen a vendor to provide the RC-RTO. Information contained in this application is the best available at present, and reflects the essential characteristics of the unit. To the extent necessary, Latham will provide the DAQ with updated information once the final selection has been made. In any case, the minimum overall VOC destruction efficiency will be 90%.

The company intends to employ essentially the same method of parametric emissions monitoring/recordkeeping, tracking distinct quantities of materials used while the RC-RTO is in operation and when it is being by-passed. Because there is not applicable regulatory provision that would require a short-term VOC emission limit, Latham believes additional measures and/or instrumentation to monitor emissions are not justifiable.

[www.rpsgroup.com](http://www.rpsgroup.com)

Please note that Attachment P: Affidavit of Publication will be submitted shortly after the application, as per the Application for NSR Permit and Title V Permit Revision form instructions. RPS will provide DAQ with a copy of the legal notice content for their review and comment prior to publication.

The permit amendment application fee will be timely paid electronically in accordance with Covid-19-related procedures established by the DAQ.

This project represents a \$1.6 million capital investment, which will allow Latham to respond to current, unprecedented market demand for its products, and add 50 full-time employees to its payroll.

- o O o -

Latham and RPS look forward to working with WVDEP on this very important, time-critical undertaking.

Please contact me directly at (312) 262-4371 or [Christopher.Blume@rpsgroup.com](mailto:Christopher.Blume@rpsgroup.com) if you require any additional information or clarification to act upon this application.

Sincerely,

RPS



Christopher Blume, P.E.  
*Vice President*


Att: Reg. 13/30 RC-RTO Amendment Application

cc: Theresa Elliott  
Rick Knicely  
Chris Findley

**Latham Pool Products, Inc.**  
**Jane Lew, West Virginia**  
**Reg. 13 / Reg. 30 Permit Amendment Application**

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	<p>WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION <b>DIVISION OF AIR QUALITY</b> 601 57<sup>th</sup> Street, SE Charleston, WV 25304 (304) 926-0475 <a href="http://www.dep.wv.gov/daq">www.dep.wv.gov/daq</a></p>	<p><b>APPLICATION FOR NSR PERMIT</b> <b>AND</b> <b>TITLE V PERMIT REVISION</b> <b>(OPTIONAL)</b></p>
<p>PLEASE CHECK ALL THAT APPLY TO <b>NSR (45CSR13)</b> (IF KNOWN):</p> <p> <input type="checkbox"/> CONSTRUCTION    <input checked="" type="checkbox"/> MODIFICATION    <input type="checkbox"/> RELOCATION  <input type="checkbox"/> CLASS I ADMINISTRATIVE UPDATE    <input type="checkbox"/> TEMPORARY  <input type="checkbox"/> CLASS II ADMINISTRATIVE UPDATE    <input type="checkbox"/> AFTER-THE-FACT         </p>		<p>PLEASE CHECK TYPE OF <b>45CSR30 (TITLE V)</b> REVISION (IF ANY):</p> <p> <input type="checkbox"/> ADMINISTRATIVE AMENDMENT    <input checked="" type="checkbox"/> MINOR MODIFICATION  <input type="checkbox"/> SIGNIFICANT MODIFICATION         </p> <p>IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS <b>ATTACHMENT S</b> TO THIS APPLICATION</p>
<p><b>FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.</b></p>		
<p><b>Section I. General</b></p>		
<p>1. Name of applicant (as registered with the WV Secretary of State's Office): Latham Pool Products, Inc.</p>		<p>2. Federal Employer ID No. (<b>FEIN</b>): 27-1694029</p>
<p>3. Name of facility (if different from above):</p>		<p>4. The applicant is the:   <input type="checkbox"/> OWNER    <input type="checkbox"/> OPERATOR    <input checked="" type="checkbox"/> BOTH         </p>
<p>5A. Applicant's mailing address:  P.O. Box 550 Jane Lew, WV 26378</p>	<p>5B. Facility's present physical address:  176 Viking Drive Jane Lew, WV 26378</p>	
<p>6. <b>West Virginia Business Registration.</b> Is the applicant a resident of the State of West Virginia?    <input type="checkbox"/> YES    <input checked="" type="checkbox"/> NO</p> <p>– If <b>YES</b>, provide a copy of the <b>Certificate of Incorporation/Organization/Limited Partnership</b> (one page) including any name change amendments or other Business Registration Certificate as <b>Attachment A</b>.</p> <p>– If <b>NO</b>, provide a copy of the <b>Certificate of Authority/Authority of L.L.C./Registration</b> (one page) including any name change amendments or other Business Certificate as <b>Attachment A</b>.</p>		
<p>7. If applicant is a subsidiary corporation, please provide the name of parent corporation:</p>		
<p>8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i>?    <input checked="" type="checkbox"/> YES    <input type="checkbox"/> NO</p> <p>– If <b>YES</b>, please explain:        Latham Pool Products, Inc. leases the site.</p> <p>– If <b>NO</b>, you are not eligible for a permit for this source.</p>		
<p>9. Type of plant or facility (stationary source) to be <b>constructed, modified, relocated, administratively updated</b> or <b>temporarily permitted</b> (e.g., coal preparation plant, primary crusher, etc.): Reinforced composite plastic manufacturing</p>		<p>10. North American Industry Classification System (<b>NAICS</b>) code for the facility:  326199</p>
<p>11A. DAQ Plant ID No. (for existing facilities only): 0 4 1 – 0 0 0 4 5</p>	<p>11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R13-2332G, R30-04100045-2017(MM01)</p>	
<p><b>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</b></p>		



27. Fill out the <b>Fugitive Emissions Data Summary Sheet</b> and provide it as <b>Attachment K</b> . <span style="float: right;"><b>NO CHANGE</b></span>
28. Check all applicable <b>Emissions Unit Data Sheets</b> listed below: <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Bulk Liquid Transfer Operations</div> <div style="width: 33%;"><input type="checkbox"/> Haul Road Emissions</div> <div style="width: 33%;"><input type="checkbox"/> Quarry</div> <div style="width: 33%;"><input type="checkbox"/> Chemical Processes</div> <div style="width: 33%;"><input type="checkbox"/> Hot Mix Asphalt Plant</div> <div style="width: 33%;"><input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities</div> <div style="width: 33%;"><input type="checkbox"/> Concrete Batch Plant</div> <div style="width: 33%;"><input type="checkbox"/> Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Storage Tanks</div> <div style="width: 33%;"><input type="checkbox"/> Grey Iron and Steel Foundry</div> <div style="width: 33%;"><input type="checkbox"/> Indirect Heat Exchanger</div> <div style="width: 33%;"><input type="checkbox"/> General Emission Unit, specify</div> </div>
Fill out and provide the <b>Emissions Unit Data Sheet(s)</b> as <b>Attachment L</b> . <b>N/A</b>
29. Check all applicable <b>Air Pollution Control Device Sheets</b> listed below: <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Absorption Systems</div> <div style="width: 33%;"><input type="checkbox"/> Baghouse</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input checked="" type="checkbox"/> Adsorption Systems</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Mechanical Collector</div> <div style="width: 33%;"><input type="checkbox"/> Afterburner</div> <div style="width: 33%;"><input type="checkbox"/> Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Wet Collecting System</div> </div>
<input checked="" type="checkbox"/> Other Collectors, specify Rotary concentrator and regenerative thermal oxidizer
Fill out and provide the <b>Air Pollution Control Device Sheet(s)</b> as <b>Attachment M</b> .
30. Provide all <b>Supporting Emissions Calculations</b> as <b>Attachment N</b> , or attach the calculations directly to the forms listed in Items 28 through 31.
31. <b>Monitoring, Recordkeeping, Reporting and Testing Plans.</b> Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as <b>Attachment O</b> . <b>NO CHANGE</b> ➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.
32. <b>Public Notice.</b> At the time that the application is submitted, place a <b>Class I Legal Advertisement</b> in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and <b>Example Legal Advertisement</b> for details). Please submit the <b>Affidavit of Publication</b> as <b>Attachment P</b> immediately upon receipt.
33. <b>Business Confidentiality Claims.</b> Does this application include confidential information (per 45CSR31)? <div style="text-align: center;"> <input type="checkbox"/> YES     <input checked="" type="checkbox"/> NO         </div> ➤ If <b>YES</b> , identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's " <b>Precautionary Notice – Claims of Confidentiality</b> " guidance found in the <b>General Instructions</b> as <b>Attachment Q</b> .

### Section III. Certification of Information

34. <b>Authority/Delegation of Authority.</b> Only required when someone other than the responsible official signs the application. Check applicable <b>Authority Form</b> below: <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"><input type="checkbox"/> Authority of Corporation or Other Business Entity</div> <div style="width: 50%;"><input type="checkbox"/> Authority of Partnership</div> <div style="width: 50%;"><input type="checkbox"/> Authority of Governmental Agency</div> <div style="width: 50%;"><input type="checkbox"/> Authority of Limited Partnership</div> </div>
Submit completed and signed <b>Authority Form</b> as <b>Attachment R</b> . <span style="float: right;"><b>N/A</b></span>
<b>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</b>



**35A. Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

**Certification of Truth, Accuracy, and Completeness**

I, the undersigned ☒ **Responsible Official** / ☐ **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

**Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE

*Matt Rowe*

(Please use blue ink)

DATE:

*11/19/2020*

(Please use blue ink)

35B. Printed name of signee: Matt Rowe

35C. Title: VP of  
EHS/Quality/Autocovers

35D. E-mail: mattrowe@lathampool.com

35E. Phone: (800) 833-3800

35F. FAX:

36A. Printed name of contact person (if different from above): Chris Blume

36B. Title: Consultant

36C. E-mail:  
Christopher.blume@rpsgroup.com

36D. Phone: (312) 576-8058

36E. FAX:

**PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate               | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet            |
| <input type="checkbox"/> Attachment B: Map(s)  | <input type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)                     |
| <input checked="" type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input checked="" type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s) |
| <input checked="" type="checkbox"/> Attachment D: Regulatory Discussion              | <input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations     |
| <input checked="" type="checkbox"/> Attachment E: Plot Plan                          | <input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)   | <input checked="" type="checkbox"/> Attachment P: Public Notice                         |
| <input checked="" type="checkbox"/> Attachment G: Process Description                | <input type="checkbox"/> Attachment Q: Business Confidential Claims                     |
| <input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS)            | <input type="checkbox"/> Attachment R: Authority Forms                                  |
| <input checked="" type="checkbox"/> Attachment I: Emission Units Table               | <input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information   |
| <input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> Application Fee Will pay with credit card by phone. |

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

**FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:**

- ☐ Forward 1 copy of the application to the Title V Permitting Group and:
- ☐ For Title V Administrative Amendments:
- ☐ NSR permit writer should notify Title V permit writer of draft permit,
- ☐ For Title V Minor Modifications:
- ☐ Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
- ☐ NSR permit writer should notify Title V permit writer of draft permit.
- ☐ For Title V Significant Modifications processed in parallel with NSR Permit revision:
- ☐ NSR permit writer should notify a Title V permit writer of draft permit,
- ☐ Public notice should reference both 45CSR13 and Title V permits,
- ☐ EPA has 45 day review period of a draft permit.



**Attachment A**  
**Business Registration Information**

## West Virginia Secretary of State — Online Data Services

## Business and Licensing

Online Data Services Help

## Business Organization Detail

NOTICE: The West Virginia Secretary of State's Office makes every reasonable effort to ensure the accuracy of information. However, we make no representation or warranty as to the correctness or completeness of the information. If information is missing from this page, it is not in the The West Virginia Secretary of State's database.

## LATHAM POOL PRODUCTS, INC.

Organization Information									
Org Type	Effective Date	Established Date	Filing Date	Charter	Class	Sec Type	Termination Date	Termination Reason	
C   Corporation	12/20/2012		12/20/2012	Foreign	Profit				

Organization Information			
Business Purpose	3399 - Manufacturing - Miscellaneous Manufacturing - Other Miscellaneous Manufacturing (jewelry, silverware, sporting & athletic goods, dolls, toys & games, office supplies (except paper), signs, gasket, packing & sealing, musical instruments, fasteners, buttons, needles & pins, brooms, brushes & mops, burial caskets)		Capital Stock
Charter County	Lewis	Control Number	99Y8P
Charter State	DE	Excess Acres	
At Will Term		Member Managed	
At Will Term Years		Par Value	
Authorized Shares	0	Young Entrepreneur	Not Specified

Addresses	
Type	Address
<b>Local Office Address</b>	176 VIKING DRIVE JANE LEW, WV, 26378
<b>Mailing Address</b>	787 WATERVLIET SHAKER RD LATHAM, NY, 12110 USA
<b>Notice of Process Address</b>	CAPITOL CORPORATE SERVICES, INC. 206 E 9TH ST, STE 1300 STE 1300 AUSTIN, TX, 787014411
<b>Principal Office Address</b>	787 WATERVLIET SHAKER ROAD LATHAM, NY, 12110 USA
Type	Address

Officers	
Type	Name/Address
<b>Director</b>	RUSSELL GEHRETT 375 PARK AVENUE 17TH FLOOR NEW YORK, NY, 10152
<b>Director</b>	ANDREW SINGER 375 PARK AVENUE 17TH FLOOR NEW YORK, NY, 10152
<b>President</b>	SCOTT RAJESKI, CEO 787 WATERVLIET SHAKER ROAD LATHAM, NY, 12110
<b>Treasurer</b>	JOHN KEMPF, CFO 787 WATERVLIET SHAKER ROAD LATHAM, NY, 12110
Type	Name/Address

DBA			
DBA Name	Description	Effective Date	Termination Date

EQUATOR POOL PRODUCTS	TRADENAME	5/3/2013	
VIKING POOLS	TRADENAME	2/7/2013	
DBA Name	Description	Effective Date	Termination Date

**Mergers**

Merger Date	Merged	Merged State	Survived	Survived State
12/26/2012	VIKING POOLS, LLC	WV	LATHAM POOL PRODUCTS, INC.	DE
Merger Date	Merged	Merged State	Survived	Survived State

Date	Amendment
12/26/2012	MERGER: MERGING VIKING POOLS, LLC, A QUALIFIED WV LIMITED LIABILITY COMPANY WITH AND INTO LATHAM POOL PRODUCTS, INC., A QUALIFIED DE CORPORATION, THE SURVIVOR
Date	Amendment

**Annual Reports**

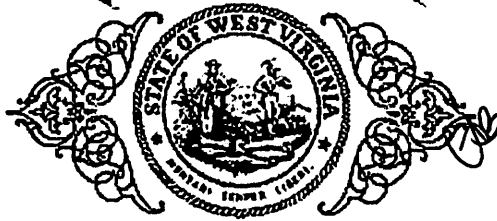
Filed For
2020
2019
2018
2017x
2017
2016
2015
2014
Date filed

For more information, please contact the Secretary of State's Office at 304-558-8000.

Thursday, February 13, 2020 — 1:44 PM

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# State of West Virginia



## Certificate

*I, Natalie E. Tennant, Secretary of State of the  
State of West Virginia, hereby certify that*

**LATHAM POOL PRODUCTS, INC.**

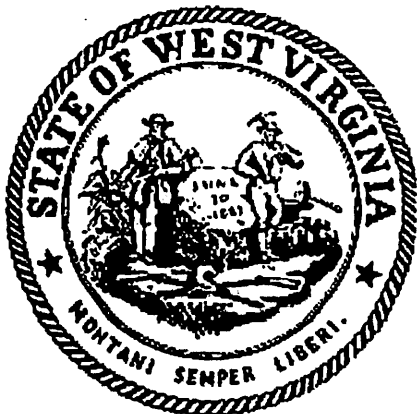
**Control Number: 99Y8P**

a corporation formed under the laws of Delaware has filed its "Application for Certificate of Authority" to transact business in West Virginia as required by the provisions of the West Virginia Code. I hereby declare the organization to be registered as a foreign corporation from its effective date of December 20, 2012.

Therefore, I issue this

### **CERTIFICATE OF AUTHORITY**

to the corporation authorizing it to transact business in West Virginia



*Given under my hand and the  
Great Seal of the State of  
West Virginia on this day of  
December 20, 2012*

*Natalie E. Tennant*

*Secretary of State*

**Attachment C**  
**Schedule of Planned Installation/Change**



## Schedule of Planned Changes

Latham is requesting three anticipated facility and operational changes to be reflected in modified Reg. 13 and Reg. 30 permits. These changes will begin once the permit has been amended.

1. Latham intends to construct a curing room, which will adjoin the Pool Production building. There will essentially be no emissions attributable to the new curing room.
2. A rotary condenser and regenerative thermal oxidizer (RC-RTO) will be installed to abate VOC emissions from gelcoat and vinyl ester resin application for EU-1B (Pool Production). General purpose polyester resin emissions will not be controlled by the new RC-RTO. This will require the construction of a dividing wall within the Pool Production Building to allow such emissions to be separately captured. There will be no net change in EU-1B and facility-wide VOC emission limits.

**Attachment D  
Regulatory Discussion**

## Regulatory Discussion

The discussion below is intended to reflect only new regulatory requirements that are of confirmed or potential relevance to changes addressed in this amendment application. Other applicable regulatory requirements, as documented in the existing Reg 13/30 permits, will continue to apply.

### Rule 6

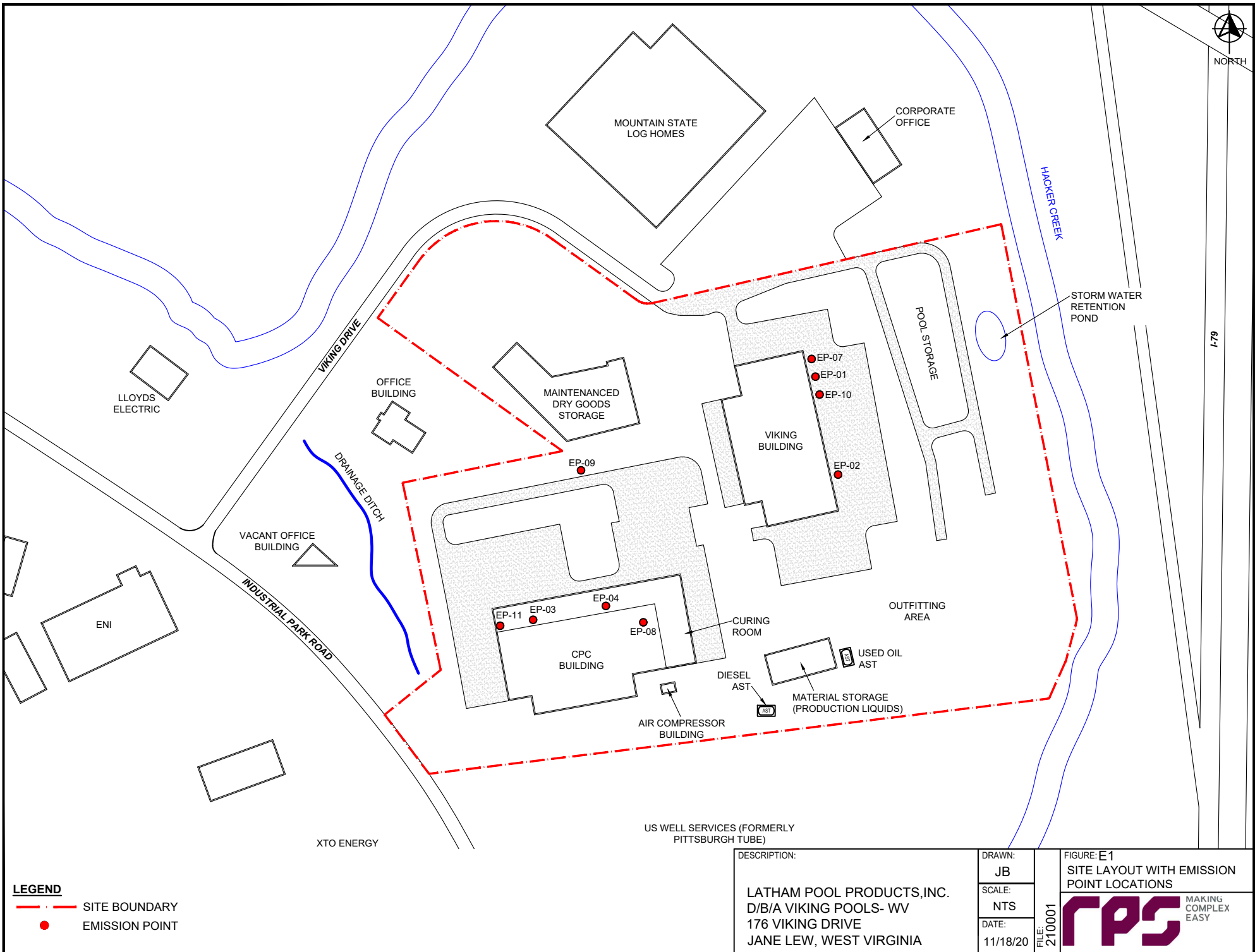
Rule 6 covers the control of air pollution from combustion of refuse, i.e. incinerators. Latham is installing a RC-RTO at their Jane Lew facility, and while the RC-RTO will combust natural gas and VOC emissions, not refuse, WVDEP requires a demonstration of PM emissions. The RC-RTO would emit 0.0326 tons of PM per year (see Table N-4 for more detail).

### CAM

The pollutant specific emission units that involve VOC/HAP emissions are exempt from the CAM Rule because of the site's 4W NESHAP applicability. Furthermore, there is also no underlying regulatory requirement for a continuous emissions monitoring system (CEMS) to be installed at the facility.

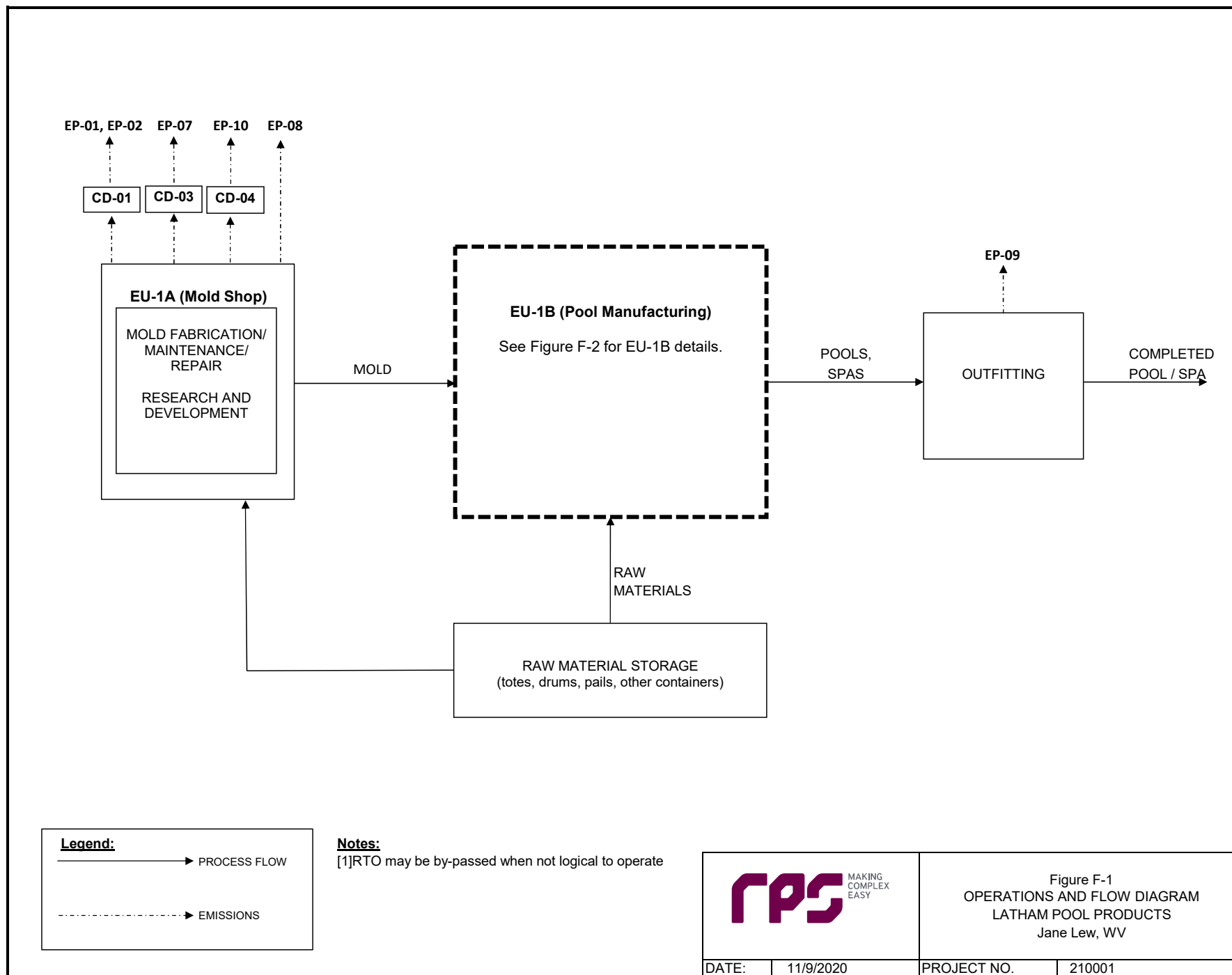
The overspray filters used at the facility to collect PM are inherent to the process to prevent equipment from breaking down, thus it is not a control device used to achieve compliance with any emission limitation or standard. Due to this, CAM is not applicable to pollutant specific emission units involving PM.

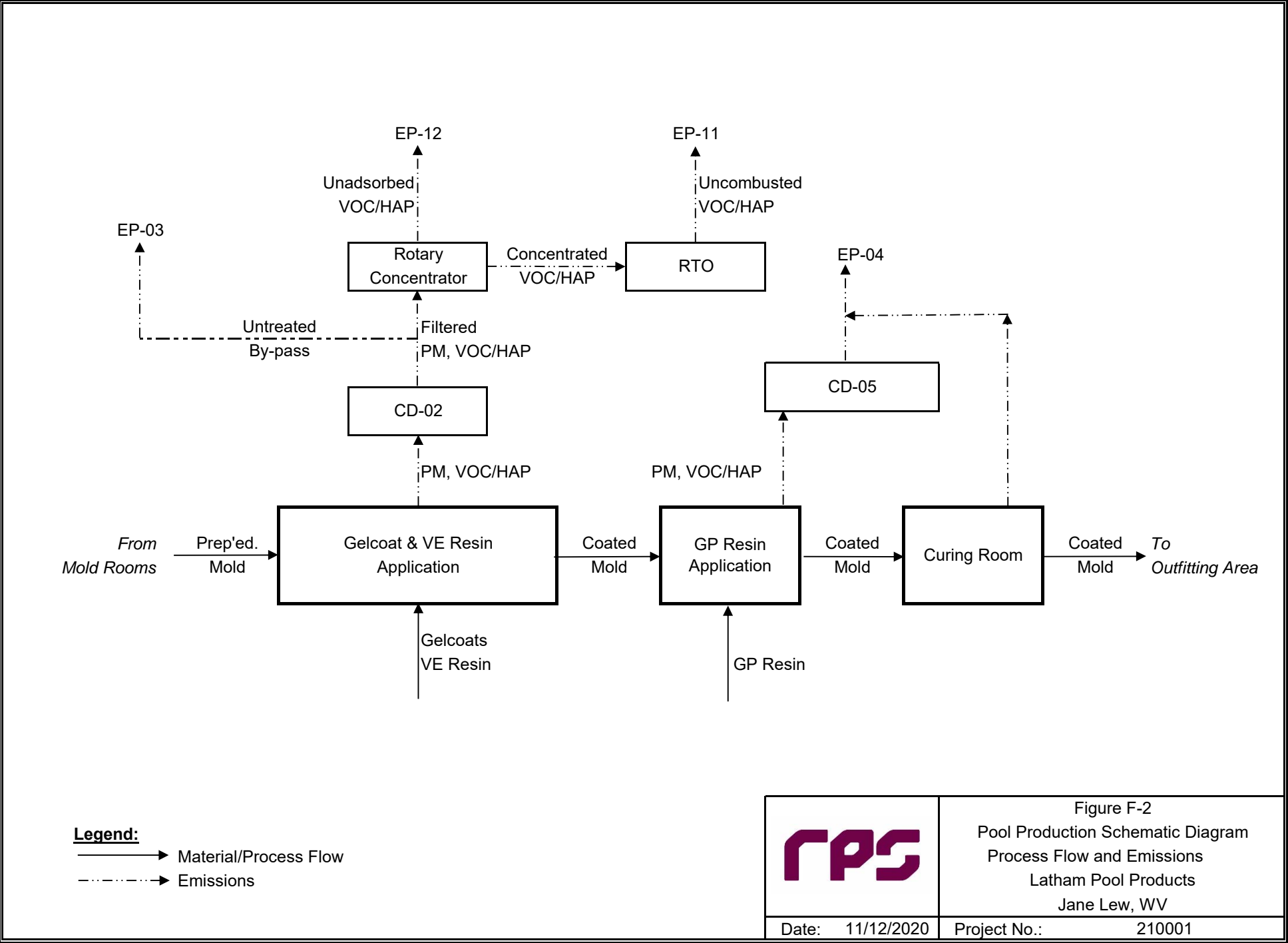
**Attachment E  
Plot Plan**





**Attachment F  
Process Flow Diagram**





**Attachment G  
Process Description**

## Process Description

Latham Pool Products manufactures fiberglass reinforced pools and spas for residential markets.

Molds used to produce pools and spas are fabricated, maintained and repaired in the “Mold Shop” building (Viking Building, EU-1A). This segment of the operation involves the use of tooling gelcoat, vinyl ester resin, general purpose resin, and miscellaneous materials.

The mold is prepared by applying wax (a release agent), which takes place in materials storage bay of the Pool Production Building (CPC Building, EU-1B). The prep'ed. mold is coated using gelcoat and vinyl ester resin in the “eastern half” of the production area of the building; and subsequently using general purpose resin in the “western half”.

Coated molds will be transferred to the curing room, for temporary storage; prior to being moved to the Outfitting area, where miscellaneous hardware (e.g., skimmers, returns, etc.) and features (e.g., accent tiles) will be affixed to produce the finished product.

VOC emission from gelcoat and vinyl ester usage in the Pool Production Building will be captured and routed to a new rotary concentrator and regenerative thermal oxidizer (RC-RTO) when economically and operationally beneficial.



**Attachment I  
Emission Unit Table**

**Attachment I**  
**Emission Units Table**  
(includes all emission units and air pollution control devices  
that will be part of this permit application review, regardless of permitting status)

Emission Unit ID <sup>1</sup>	Emission Point ID <sup>2</sup>	Emission Unit Description	Year Installed/Modified	Design Capacity	Type <sup>3</sup> and Date of Change	Control Device <sup>4</sup>
EU-1A	EP-01, EP-02 Exhaust System Stacks	Mold Fabrication/Maintenance/Repair/Research and Development (Blue Viking Building)	See active permits	N/A	None	CD-01 Roll Media Filter
EU-1A	EP-07 Dust Collection Stack	Mold Fabrication/Maintenance/Repair/Research and Development (Blue Viking Building)	See active permits	N/A	None	CD-03 EuroVac Filter
EU-1A	EP-10 Dust Collection Stack	Mold Fabrication/Maintenance/Repair/Research and Development (Blue Viking Building)	2020	N/A	None	CD-04 EuroVac* Filter
EU-1A	EP-08 Fugitive	Final Mold Prep (Green CPC Building)	See active permits	N/A	None	None
EU-1B	EP-03 Exhaust System Stacks	Manufacturing Process - GC & VE Bypass RTO (Green CPC Building)	2020	N/A	Modification	CD-02 Roll Media Filter
EU-1B	EP-04 Exhaust Stack	Manufacturing Process - GP Build Area (Green CPC Building)	2020	N/A	Modification	CD-05 Roll Media Filter
EU-1B	EP-11 RTO Stack	Manufacturing Process - GC & VE to RC-RTO	2020	N/A	New	CD-06 RC-RTO*
EU-1B	EP-12 RC Stack	Manufacturing Process - GC & VE to RC-RTO	2020	N/A	New	CD-06 RC-RTO*
EU-02	EP-09 Fugitive	Finishing Area (Outfitting)	See active permits	N/A	None	None
	Notes:	* or equivalent				

<sup>1</sup> For Emission Units (or Sources) use the following numbering system: 1S, 2S, 3S,... or other appropriate designation.

<sup>2</sup> For Emission Points use the following numbering system: 1E, 2E, 3E, ... or other appropriate designation.

<sup>3</sup> New, modification, removal

<sup>4</sup> For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

**Attachment J**  
**Emission Points Data Summary Sheet**

# Attachment J

## EMISSION POINTS DATA SUMMARY SHEET

Table 1: Emissions Data															
Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type <sup>1</sup>	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (chemical processes only)		All Regulated Pollutants - Chemical Name/CAS <sup>3</sup>  (Speciate VOCs & HAPS)	Maximum Potential Uncontrolled Emissions <sup>4</sup>		Maximum Potential Controlled Emissions <sup>5</sup>		Emission Form or Phase  (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used <sup>6</sup>	Emission Concentration <sup>7</sup> (ppmv or mg/m <sup>3</sup> )
		ID No.	Source	ID No.	Device Type	Short Term <sup>2</sup>	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
EP-03	Green CPC Building Pool Manufacturing Emissions	EU-1B	Pool Manufacturing Building	CD-02	Fabric filter	N/A	N/A	VOCs PM/PM10	N/A	See Table N-1A, N-1B, N-2, N-3	N/A	See Table N-1A, N-1B, N-2, N-3	Vapor Solid/Liquid	EE; MB	N/A
EP-04	Green CPC Building Pool Manufacturing Emissions	EU-1B	Pool Manufacturing Building	CD-05	Fabric filter	N/A	N/A	VOCs PM/PM10	N/A	See Table N-1A, N-1B, N-2, N-3	N/A	See Table N-1A, N-1B, N-2, N-3	Vapor Solid/Liquid	EE; MB	N/A
EP-11	GC & VE emissions to RC-RTO	EU-1B	Pool Manufacturing Building	CD-06	RC-RTO	N/A	N/A	VOCs PM/PM10	N/A	See Table N-1A, N-1B, N-2, N-3	N/A	See Table N-1A, N-1B, N-2, N-3	Vapor Solid/Liquid	EE; MB	N/A
EP-12	GC & VE emissions to RC-RTO	EU-1B	Pool Manufacturing Building	CD-06	RC-RTO	N/A	N/A	VOCs PM/PM10	N/A	See Table N-1A, N-1B, N-2, N-3	N/A	See Table N-1A, N-1B, N-2, N-3	Vapor Solid/Liquid	EE; MB	N/A

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

<sup>1</sup> Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

7 Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m<sup>3</sup>) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO<sub>2</sub>, use units of ppmv (See 45CSR10).

**Attachment M**  
**Air Pollution Control Device**

**Attachment M**  
**Air Pollution Control Device Sheet**  
(OTHER COLLECTORS)

Control Device ID No. (must match Emission Units Table): CD-06

**Equipment Information**

1. Manufacturer:     Custom Model No.	2. Control Device Name: RC-RTO Type: Rotary concentrator/ regenerative thermal oxidizer
3. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.	
4. On a separate sheet(s) supply all data and calculations used in selecting or designing this collection device.	
5. Provide a scale diagram of the control device showing internal construction.	
6. Submit a schematic and diagram with dimensions and flow rates.	
7. Guaranteed minimum collection efficiency for each pollutant collected:  >99% collection efficiency for VOC	
8. Attached efficiency curve and/or other efficiency information.	
9. Design inlet volume:                      55,000 SCFM	10. Capacity:
11. Indicate the liquid flow rate and describe equipment provided to measure pressure drop and flow rate, if any.	
12. Attach any additional data including auxiliary equipment and operation details to thoroughly evaluate the control equipment.	
13. Description of method of handling the collected material(s) for reuse or disposal.	

**Gas Stream Characteristics**

14. Are halogenated organics present? Are particulates present? Are metals present?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No <input type="checkbox"/> No <input checked="" type="checkbox"/> No	
15. Inlet Emission stream parameters:	<b>Maximum</b>	<b>Typical</b>	
Pressure (mmHg):			
Heat Content (BTU/scf):			
Oxygen Content (%):			
Moisture Content (%):			
Relative Humidity (%):			

16. Type of pollutant(s) controlled: <input type="checkbox"/> SO <sub>x</sub> <input type="checkbox"/> Odor <input type="checkbox"/> Particulate (type): <input checked="" type="checkbox"/> Other (VOC)	
17. Inlet gas velocity: 66.67 ft/sec	18. Pollutant specific gravity:
19. Gas flow into the collector: ACF @ °F and PSIA	20. Gas stream temperature: Inlet: °F Outlet: 439-615 °F
21. Gas flow rate: Design Maximum: ACFM Average Expected: 55,000 ACFM	22. Particulate Grain Loading in grains/scf: Inlet: Outlet:
23. Emission rate of each pollutant (specify) into and out of collector:	
<b>Pollutant</b>	<b>IN Pollutant</b> <b>lb/hr</b> <b>grains/acf</b>
<b>Emission Capture Efficiency %</b>	<b>OUT Pollutant</b> <b>lb/hr</b> <b>grains/acf</b>
<b>Control Efficiency %</b>	
A VOC	See Table N-1A/1B
B	
C	
D	
24. Dimensions of stack: Height 32 ft. Diameter 4.5 ft.	
25. Supply a curve showing proposed collection efficiency versus gas volume from 25 to 130 percent of design rating of collector.	

#### Particulate Distribution

26. Complete the table:	<b>Particle Size Distribution at Inlet to Collector</b>	<b>Fraction Efficiency of Collector</b>
<b>Particulate Size Range (microns)</b>	<b>Weight % for Size Range</b>	<b>Weight % for Size Range</b>
0 – 2		
2 – 4		
4 – 6		
6 – 8		
8 – 10		
10 – 12		
12 – 16		
16 – 20		
20 – 30		
30 – 40		
40 – 50		
50 – 60		
60 – 70		
70 – 80		
80 – 90		
90 – 100		
>100		



27. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):

28. Describe the collection material disposal system:

29. Have you included **Other Collectores Control Device** in the Emissions Points Data Summary Sheet?

**30. Proposed Monitoring, Recordkeeping, Reporting, and Testing**

Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING:

RECORDKEEPING:

REPORTING:

TESTING:

MONITORING:	Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.
RECORDKEEPING:	Please describe the proposed recordkeeping that will accompany the monitoring.
REPORTING:	Please describe any proposed emissions testing for this process equipment on air pollution control device.
TESTING:	Please describe any proposed emissions testing for this process equipment on air pollution control device.

31. Manufacturer's Guaranteed Control Efficiency for each air pollutant.

32. Manufacturer's Guaranteed Control Efficiency for each air pollutant.

33. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.

**Attachment M**  
**Air Pollution Control Device Sheet**  
(ADSORPTION SYSTEM)

Control Device ID No. (must match Emission Units Table): CD-06

**Equipment Information**

1. Name of Control Device: Rotary concentrator	2. Manufacturer: Custom Model No.
3. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.	

**Gas Stream Characteristics**

4. Gas Flow Rate into the Collector: ACFM @ °F Relative Humidity PSIA						
5. Emission Rate of each Pollutant (Specify) into and out of Collector:						
	IN			OUT		
<b>Pollutant</b>	<b>lb/hr</b>	<b>grains/acf</b>	<b>ppm (volume)</b>	<b>lb/hr</b>	<b>grains/acf</b>	<b>ppm (volume)</b>
A						
B						
C						
D						
E						
6. LEL (lower explosive limit) for most volatile pollutant: Pollutant PPM						
7. List vapor pressure (mmHg) at the operating temperature for each pollutant in inlet stream:						
	<b>Pollutant</b>	<b>Temp</b>	<b>MmHg</b>			
	A					
	B					
	C					
	D					
	E					

**Adsorbent Characteristics**

8. Adsorbent: Type: Zeolite adsorbent Manufacturer: Grade No.: Specifications:	9. Maximum adsorbate loading: lb pollutant/lb of adsorbent
10. Pressure drop across unit: (in inches of water)	11. Number of beds per unit:
12. Weight of adsorbent material per bed: lb	13. Adsorbent media average particle size: microns
14. Adsorber geometry: Length: ft Diameter: ft Bed Depth: ft Bed Surface Area: ft <sup>2</sup>	15. Temperature Range Adsorption: Min. Temp. °F Max. Temp. °F Average Temp. °F
16. Cycle time for adsorption: hr	17. Frequency of adsorbent replacement:
18. Cycle time for drying before adsorbing: hr	yr
19. Saturation Capacity of Pollutant on adsorbent (supply units):	
20. Length of mass transfer zone: in	

### Regenerative Systems

21. Type of regeneration: <input type="checkbox"/> Replacement <input type="checkbox"/> Stream <input type="checkbox"/> Other, specify:		
22. Method of Regeneration: <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Alternate use of                      entire units  <input type="checkbox"/> Alternate use of                      beds in a single unit         </div> <div style="width: 45%;"> <input type="checkbox"/> Source shut down  <input type="checkbox"/> Other (describe):         </div> </div>		
23. Cycle time for regeneration:                      hr	24. Emission steam velocity through bed:                      ft/min	
	25. Steam flow rate:                      lb/min Steam temp.:                      °F Steam pressure:                      PSIA	
26. Disposition of vapors during regeneration:		
27. Guaranteed minimum efficiency per pollutant captured:	<b>Captured Pollutant</b>	<b>Minimum Efficiency</b>
A		%
B		%
C		%
D		%
28. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):		
29. Describe the collection material disposal system:		
30. Have you included <b>Adsorption Control Device</b> in the Emissions Points Data Summary Sheet?		

**31. Proposed Monitoring, Recordkeeping, Reporting, and Testing**

Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING:

RECORDKEEPING:

REPORTING:

TESTING:

MONITORING: Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.

RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.

REPORTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

TESTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

32. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.

33. Manufacturer's Guaranteed Control Efficiency for each air pollutant.

34. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.

## **8.0 GENERAL EQUIPMENT DESCRIPTION – RTO EQUIPMENT**

### **8.01 OXIDATION CHAMBER**

One (1) oxidation chamber will be provided. The oxidation chamber will be comprised of two sections located above each pair of heat recovery chambers. The combustion chamber itself will be sized at 16'-0" long x 7'-0" wide x 4'-3" tall for the specified airflow and temperature in order to provide an average of 0.82 second retention time at 1,525F.

Internal Volume:	
= ( 45 Ft <sup>2</sup> + 7 Ft <sup>2</sup> ) X 15 Ft	
= 311 Ft <sup>3</sup>	
Retention Time:	
= 22,700 ACFM @ 1525 Deg F	
= 0.82 Seconds	

The oxidation chamber will be fabricated from minimum 3/16" thick A36 carbon steel plate with structural reinforced flange and stiffeners. The section's flange connections will be bolted and gasketed in the field during installation to assure airtight construction.

The oxidation chamber will be provided with a hinged access door with easy opening davits for routine inspection of the burner and internal insulation.

***No external insulation and cladding are provided or necessary at this location.***



### **8.02 HEAT RECOVERY CHAMBER**

Depending on RTO size, two (2) heat recovery chambers, mastic lined and internally insulated with Thermal Ceramics, or equal, insulation, will be provided. Each chamber will be nominally 7'-0"L X 7'-0"W X 8'-6"H and be fabricated from a minimum 3/16" thick A36 carbon steel plate with structural reinforced flanges and stiffeners (similar in design to the oxidation chamber).

The recovery chamber sections will be installed on a painted structural steel support, bolted and gasketed to the oxidation chamber to assure airtight construction.

The recovery chamber also includes a A36 carbon steel **proprietary Quonset style distribution cold face structure** for the specified heat recovery media. The support structure is designed for a maximum continuous operating temperature of 900°F.

***No external insulation and cladding are provided or necessary at this location.***




### 8.03 INLET/OUTLET TRANSITION – NOT REQUIRED

Not required with use of the proprietary Quonset style cold-face support assembly inlet and outlet transitional ductwork is not required.

*Due to low temperatures external skin insulation and cladding are not necessary at this location.*

### 8.04 HEAT RECOVERY MEDIA

Many forms of heat recovery media are available. For this application, each regenerative heat recovery chamber will be provided with 1” ceramic saddles; total volume of media is at 648 Ft<sup>3</sup>. The media is chemically and thermally stable for rapid heat up and cool-down of the system. The heat exchange area is sized to yield 95% thermal energy recovery with a 3-minute cycle time. **As an optional adder, we have provided access doors above the heat recovery chambers for removal, installation, and/or washdown cleaning of the media.**

		
<i>Many forms of media are available</i>	<i>MLM structured media</i>	<i>1” ceramic saddles</i>

### 8.05 INTERNAL INSULATION

One (1) lot of internal thermal insulation will be provided. Both the heat recovery and oxidation chambers will be lined and insulated with Thermal Ceramics, or equal, insulation utilizing the ***European methodology***. This method provides a row of 1” thick blanket insulation material under the normal module insulation to minimize concerns associated with outside skin hot spots.

All internal insulation is shop installed and inspected prior to shipment. Each normal module is a soft ceramic blanket fiber with 304 stainless steel reinforcement and anchor mounting hardware. The ceramic insulation modules are 6" thick 8# density in each of two (2) recovery chambers and 6" thick, 10# density in the combustion chamber. The insulation is capable of operating at 2,400°F. The internal insulation is designed to provide a 200°F skin temperature while operating at 1,650°F. (Skin temperature is based on 5-mph wind velocity and 70°F ambient temperature.)



*Combustion Chamber Internal Insulation*

## 8.06 INLET AND OUTLET MANIFOLDS

Process air will be supplied to and from the oxidizer through the inlet and outlet manifolds. The inlet and outlet manifolds will be constructed from a minimum 3/16" thick A36 carbon steel with flanged companion angle all weld construction. The manifold system will be structurally reinforced for temperature and pressure requirements.

*Due to low temperatures external skin insulation and cladding are not necessary at this location.*

## 8.07 PROCESS AIR FLOW CONTROL VALVES

Each of two (2) Regenerative Thermal Oxidizer (RTO) control valves utilize one (1) vertical blade type, dual seat flow control valve located under each heat recovery chamber to control the direction of flow of the process air into and out of the oxidizer. The valves include pneumatic actuators that are controlled by the Allen-Bradley PLC. The valves cycle the airflow, alternating the airflow direction through the oxidizer to maintain optimum heat recovery effectiveness during normal operation.

The valve shaft is fabricated from **304 stainless steel**. The valve housing seats and disc are fabricated from 3/16" thick A36 carbon steel. The valve components are precision machined and assembled prior to shipment. Each valve will include a Parker or equal, soft seat pneumatic actuators with mufflers and integral limit/position switches that provide a control signal to the Allen-Bradley PLC.

*Due to low temperatures external skin insulation and cladding are not necessary at this location.*



## 8.08 SINGLE (1) EXHAUST STACK WITH SAMPLING PORTS

The outlet manifold of the RTO will be connected to the main exhaust stack. **The overall height of the RTO exhaust stack will be forty (40) feet.** The stack and transition ducts are to be fabricated from A36 carbon steel and designed at approximately **54" diameter** based on 4,000 fpm at anticipated maximum flow and temperature. The stack will be designed to withstand wind and seismic load in accordance with the local building codes.

The stack is a freestanding design and will include two (2) 90° separated EPA sampling ports for compliance testing when required.

**Exhaust stack test platform via access ladder is provided as optional pricing, see Section 4.0, Pricing of Equipment, Section 4.0, page 10.**

*Due to low temperatures external skin insulation and cladding are not necessary at this location.*



## 8.09 FORCED DRAFT FAN AND MOTOR

The RTO main fan will be supplied as a **forced draft configuration** as an arrangement 8, direct drive, and manufactured as A36 carbon steel by Twin City, Air Pro, or equal. The Rotary Concentrator process exhaust fan will be of an induced draft design with similar manufacturing per above. Both fans will be supplied with flexible joints at the inlet and outlet locations and designed for lateral and axial displacement/vibration on the fan.

Fan shall be single width-single inlet, with the fan wheel chosen as either a backward curved or backward inclined design. A Falk T-10 coupling, grease lubricated self-aligning, pillow-block type bearings, bolted inlet and outlet flanges, inspection door, drain and OSHA shaft/coupling guard. The housing and bearing support will be mounted to a common structural base with the motor.

The **RTO forced draft fan** will be appropriately sized for the subject oxidizer system chosen and provided with a BALDOR/RELIANCE/WEG or equal, **50 HP**, 1800 RPM, TEFC Premium Efficient, Foot mounted, 3/60/480, xxxT Frame, and cast iron.

The **Rotary Concentrator induced draft fan** will be appropriately sized for the subject oxidizer system chosen and provided with a BALDOR/RELIANCE/WEG or equal, **125 HP**, 1800 RPM, TEFC Premium Efficient, Foot mounted, 3/60/480, xxxT Frame, and cast iron.

*All fans and motors are sized and ultimately designed with a nominal test block calculation at 10% extra on flow and 21% extra on static requirements.*

*Due to low temperatures external skin insulation and cladding are not necessary at this location.*

## 8.10 VARIABLE FREQUENCY DRIVE

The process flow will be controlled by a Allen Bradley/Rockwell, or equal, pulse width modulating (pwm) variable frequency drive (VFD) system. The VFD can be installed into the **optional priced air-conditioned NEMA 12 main control panel** and provided for indoor use.

## 8.11 BURNER, FUEL TRAIN, AND COMBUSTION BLOWER

**One (1) North American (FIVES) TEMPEST Model Low NO<sub>x</sub>** ratio regulated burner design sized to provide a **minimal 1.0 MMBTUH** at maximum capacity. This is a direct-spark style burner with no need (dependent on insurance requirements) for a pilot gas train or redundant vent valves between the blocking and shut-off valves per NFPA 86. The burner and fuel train is designed to be **fired with liquid propane (LP)** with a **gross heat content of approximately 2,572 BTU/Ft<sup>3</sup>**. All components will be shop wired in to a burner control panel.

A burner access platform with ladder access is provided as optional pricing; see Section 4.0, Pricing of Equipment, page 10.

The combustion blower will be a Twin City or equal, with a filter and silencer on the inlet and provided with a premium TEFC xxxT, **3.0 HP**, 3,443 RPM 480V/60/3 electric motor.

*All fans and motors are sized and ultimately designed with a nominal test block calculation at 10% extra on flow and 21% extra on static requirements.*

The burner systems including combustion blower will be shop wired in accordance with the specifications to the Burner Control Panel, as described in 8.20 c&d. The North American burners are minimally capable of operating at 6:1 airflow turndown and 20:1 fuel turndown based on a natural gas with a heat content of approximately 1000 BTU/Ft<sup>3</sup>.



## 8.12 OXIDIZER FRESH AIR/PURGE DAMPER

A fresh air damper will be provided. The fresh air damper will be provided as an open/closed pneumatically actuated damper arrangement, 1% leakage when closed, and fabricated from A36 carbon steel and provide a source of clean, non-hazardous air during the oxidized purge and start-up requirements when required. The valve will be provided with proof-of-open and closure switches that will be interlocked with the purge permissive control circuit in the oxidizer.

## 8.13 OXIDIZER PROCESS ISOLATION DAMPER – OPTIONAL

The RTO system will be provided with a single inlet isolation valve located upstream of the inlet location of the RTO itself and designed as 1% leakage when closed. The isolation valve will be manufactured from A36 carbon steel and provided with a two-position open/closed actuator to provide a positive separation between the process exhaust and the RTO when the RTO is not in service, and during the purge and start-up cycle per NFPA 86 requirements. The valve is provided with proof-of-open/closure switches that will be interlocked with the purge permissive control circuit in the RTO.

## 8.14 OXIDIZER PROCESS EXHAUST BAROMETRIC DAMPER - OPTIONAL

A single (1) barometric damper assembly can be provided and installed by NESTEC, Inc. This particular damper assembly is to be designed utilizing counterweights to allow smooth opening of the damper when duct pressure decreases, and smooth closing when the duct pressure increases to the normal range of duct operating pressures. Damper is to be sized to prevent the pressure in the Buyer's process exhaust ductwork from being less than -10" w.c. under all conditions. A single proximity switch is to be provided for proof of closed position.

## 8.15 PROCESS EXHAUST DUCTWORK - OPTIONAL

We have assumed **100' of galvanized/aluminized steel exhaust ductwork emanating from each of two (2) exhaust stacks located on the roof top of the production building.** Along with exhaust ductwork there will need to be **two (2) dampers (vent to atmosphere and exhaust isolation; called face and bypass dampers) associated with each rooftop exhaust location.** Along with each damper is a pneumatic operated actuator with end switches used to prove complete open and closed positions. Includes all necessary control wiring, pneumatic air piping to actuators, ductwork wooden base for structural steel support stands, and crane requirements. Please see pricing, Section 4.0 PRICE OF EQUIPMENT, Optional RTO Equipment Areas, page 10.

## 8.16 STRUCTURAL STEEL AND PAINT

The RTO will be installed on a structural steel base skid that supports heat recovery chambers, combustion chambers, and a painted steel burner access platform (optional). The structural steel base skid itself will be fabricated from A-36 grade carbon steel.

The skid unit will be lightly sandblasted and painted with one (1) coat of primer and one (1) coat of high temperature Sherwin-Williams enamel paint (HT-85015) prior to shipment.

## 8.17a SIEBU GIKEN CONCENTRATOR

**One (1) Model VMUIII-3250 V40-N concentrator system** with RTO combustion chamber heat source for desorption process of VOC's. Includes all necessary attaching ductwork and isolation dampers fas needed for tie-in to the 5,500 SCFM RTO. The concentrator is sized to manage 55,000 SCFM at < 100°F with a nominal turndown ratio of 10:1; having a final exhaust to the RTO at a nominal 5,500 SCFM.

See Section 10.0, SUPPLEMENTAL INFORMATION, SUB PART 10.0c, Preliminary Equipment Drawings, pages 38 and 39 for preliminary rotor layout drawing and technical information.

### 8.17b ROTOR CONCENTRATOR WHEELS

The concentrator wheel will consist of a **single (1) Model VMU III-3250 V40-N** wheel of specially designed hydrophobic Zeolite adsorption rotor for primarily styrene emissions adsorption.

The rotor will be manufactured from mineral fiber honeycomb structure, impregnated with high quality hydrophobic Zeolite adsorbent, and selected for maximum performance on VOC mixtures containing both high and low boiling compounds. The honeycomb structure is mounted in a carbon steel wheel with removable stub shafts for easy rotor replacement. The shaft is rotating in grease lubricated self-aligning standard pillow block ball bearings. The Zeolite rotor is not affected by corrosive substances such as strong acid, and is not blocked by high boiling solvents, particulate, or resinous materials.

The rotor material is inert, does not participate in or promote chemical reactions, and is non-flammable and water resistant. The hydrophobic zeolite exhibits exceptional hydrophobicity and preferentially adsorbs organic molecules. Zeolite molecules form organized ring structures in a crystalline structure, leaving a large internal pore volume of fixed and predictable size. The pore size is dependent on the number of molecules in the ring structure. The zeolite material is a crystalline aluminosilicate, where the aluminum has been replaced with silicon in a patented process. The zeolite rotor has been designed to provide a high level of cleaning capacity for the VOC's contained in your exhaust stream. With normal operation of the system, the zeolite material has shown to operate over ten years continuously without degradation. The rotor is mounted in its own housing, complete with seals and rotor drives independently operable. The rotor drives are 1/2 HP continuous duty gear motor drives designed for Class 1, Division 1, Group C and D environment. Internal wiring meets UL requirements for Class 1, Division 1 environments

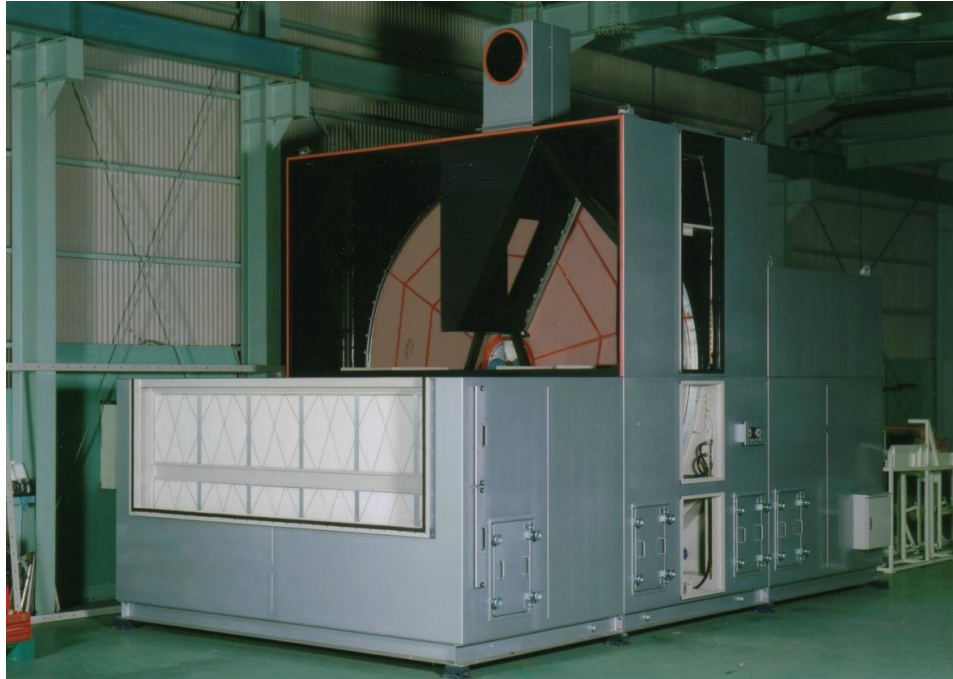


### **8.17c ROTOR CONCENTRATOR HOUSING**

The rotor concentrator housing will be manufactured from heavy gauge carbon steel, with latched and gasket access openings, thermal insulation in the high temperature sectors, and suitably coated with corrosion resistant coatings inside and out following high quality industrial manufacturing practices.

The rotor housing is designed to contain system pressures without external relief devices.

The rotor housing will be designed and manufactured in pieces to ensure that the system can be moved through the tunnel and lower level area for installation in the discussed area.



### **8.17d INTEGRATION OF SYSTEM**

Ductwork, dampers, and actuators will be supplied for the integration of the Concentrator Housing, Main Process Fans, and RTO Unit. The integrating ductwork will be fabricated from 14-gauge A36 galvanized carbon steel and reinforced. The desorption ductwork on the concentrator to the RTO unit will be covered with 3" of mineral wool insulation and jacketed with 0.032 aluminum sheet.

### **8.18 SHIPPING AND HANDLING**

All freight requirements are estimated within the pricing section by NESTEC, Inc. as Incoterms FCA from Fabrication facility to **Williams, CA** destination, prepay and add. See Section 4.0, Price of Equipment.

### **8.19 FOUNDATION – BY CUSTOMER**

Foundation installation is by the Buyer. NESTEC, Inc. to provide all necessary design loading requirements for foundation. Buyer is also responsible for all anchoring requirements including the structural steel base, fans, exhaust stack, duct mounts, shimming, and grouting.

## 8.19 RTO MOTORS SCHEDULE

NESTEC, Inc. provides below estimated motors connected and operating HP usage table.

Service Location	QTY	Item	Estimated Operating RTO BHP	Connected RTO HP	Connected kW	Volts	Phase	Hz	Operating RPM
Main Process Induced Draft Fan	1	Motor & VFD	94.00	125.0	93.21	480	3	60	~1,771
RTO Forced Draft & Desorption Fan	1	Motor & VFD	30.10	50.0	261.00	480	3	60	~1,771
Combustion Blower	1	Motor & VFD	1.10	3.0	7.46	480	3	60	~3,443

*Note: All fans and motors are provided as connected HP and ultimately designed with a test block calculation that provides a minimum 10% extra on flow and 21% extra on static requirements.*



## 8.20 CONTROLS

### 8.20a Main Control Panel

The main control panel is pre-wired, shop tested and prepared for connection to the plant power source.

The RTO control panel will be tested within the limits of the assembly. All panels will receive a point-to-point wire check. Each instrument device will be exercised to insure it is performing properly. Once this test has been completed, the PLC program will be installed and checked for proper operation. At that time, the customer will be invited to sign off on the equipment, and any deviations to the contract will be corrected.

All wiring is identified at both ends with designations corresponding to the diagrammatic wiring drawings. All wiring will be stranded copper with 600-volt insulation type MTW, THHN, or THWN and color coded to the appropriate voltages.

The equipment skid mounted panel will consist of the following components:

- Allen-Bradley CompactLogix PLC newest Model 5069-L20ER
- PanelView Plus 10" Color Touch Screen newest Model 2711P-T10C21D8S
- **Air Conditioning (A/C) required for this enclosure due to hot indoors location-OPTIONAL**
- Fireeye Burner Management System
- Endress+Hauser six (6) channel chart recorder with flash drive
- Honeywell UDC Controller for hard wired high temperature limit
- Key Lock
- E-stop Button
- Wiring trough, necessary breakers, and terminals

### 8.20b Main Fan and Combustion Blower VFD's

The main fan VFD and combustion blower motor starter can be provided in **the air-conditioned (Optional) NEMA 12 main control panel enclosure and suitable for indoor installation** such that there is established a single 480V/3/60 and 120V/1/60 supply wiring connection.

### 8.20c Transformer Panel and Local Junction Box

One (1) small enclosure each is located near the burner to house the ignition transformer and near the gas train shut-off valves and components. These panels are a NEMA 4 rated enclosures suitable for outdoors mounting and use.

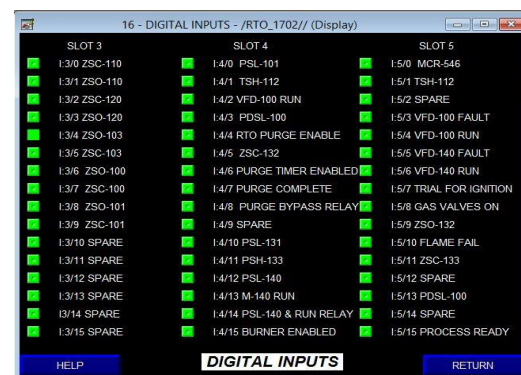
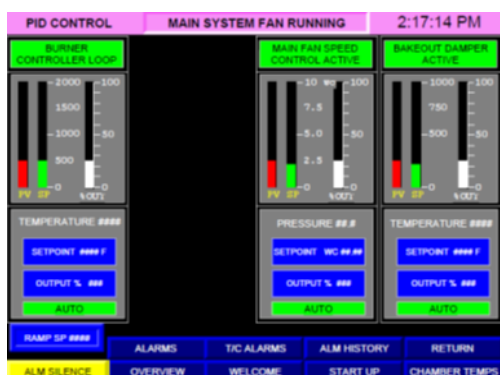
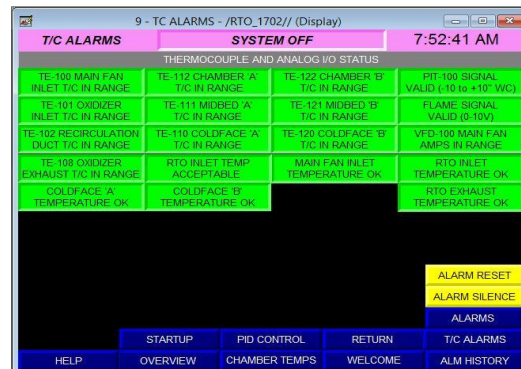
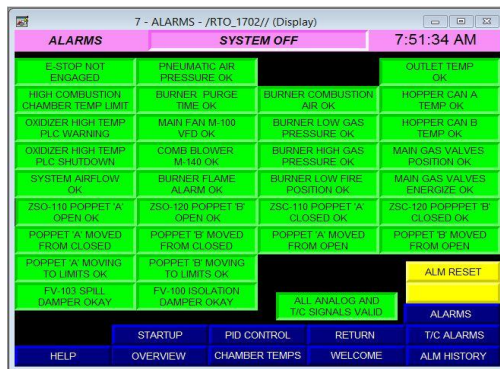
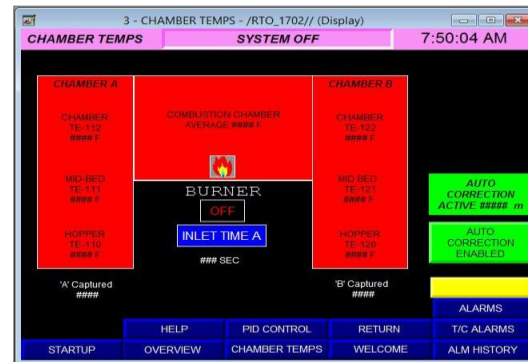
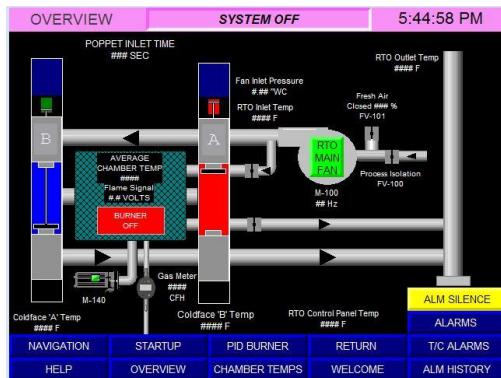
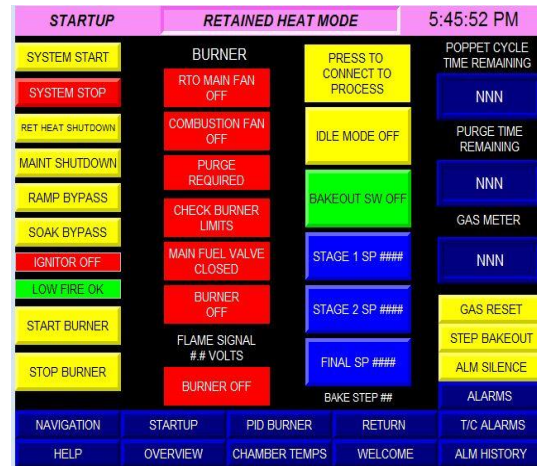
### 8.20d Field Mounted Devices

Seller will also supply necessary field components to ensure a safe and reliable system, including

- Proof of flow differential pressure switch
- One (1) Endress+Hauser inlet process exhaust flow pressure transmitter
- Pneumatic air accumulator manifold pipe with pressure relief valve
- Pneumatic air low pressure switch
- Total (8) thermocouples for temperature monitoring at the inlet (1), hopper cold face (2), burner chamber (2), each mid-bed (2), exhaust stack (1). Thermocouples shall be dual element type K for a total of 8 signals
- All **liquid propane (LP)** safety components supplied per NFPA 86 with IRI/FM approvable gas train
- One (1) Fire-Eye brand self-checking Ultra-Violet (UV) scanner

## 8.20e PanelView HMI Screens

Below are a few sample views of the user-friendly human machine interface (HMI) screens.



**Attachment N  
Supporting Calculations**

**Table N-1A**

**\*Maximum Allowable VOC Emissions, 100% Bypass<sup>5,6</sup>**

**Latham Pool Products, Inc. d/b/a Viking Pools-WV**

**Jane Lew, WV**

<b>Material<sup>1,2</sup></b>	<b>Neat Basis Annual Usage<sup>3</sup> (ton/yr)</b>	<b>VOC Content<sup>2</sup> (lb/ton)</b>	<b>Annual Uncontrolled VOC Emissions (ton/yr)</b>
<b>EU-1B - Pool Manufacturing</b>			
Gelcoat <sup>1</sup>	253	532	67.3
Vinyl ester resin	688	109	37.5
GP polyester resin <sup>8</sup>	1,510	79	59.7
Catalyst (MEKP) <sup>4</sup>	49	14	0.4
<b>Pool Fabrication Total</b>		<b>Total =</b>	<b>164.8</b>

**Notes:**

<sup>1</sup> For certain product brands, clear gelcoat can be applied as a filled gelcoat that can contain up to 5% acrylic flake (as applied).

<sup>2</sup> VOC contents are based on the ACMA Unified Emission Factors for styrene and methyl methacrylate for the materials represented above. Vinyl ester resin contains minor amounts of vinyl toluene, which is a VOC and is emitted at the same rate as styrene.

Clear gelcoat VOC content has been used as a conservative surrogate for all gelcoats.

<sup>3</sup> Based on average material usage proportions from BOMs for a Corinthian 2020 Ocean Blue pool and for an Apollo mold.

<sup>4</sup> Total Annual VOC Emissions include methyl ethyl ketone emissions from catalyst usage.

Methyl ethyl ketone peroxide catalyst (MEKP) is added at the ratio of up to 2% of the mass of gelcoat and resin applied:

MEKP contains 2% MEK (a VOC), which is emitted during gelcoat/resin application and curing.

MEKP also contains dimethyl phthalate (DMP, a VOC and a HAP), which is emitted in negligible quantities.

<sup>5</sup> HAP content has been conservatively assumed to be equal to VOC content.

<sup>6</sup> Includes VOC and HAP emission allocations for exempt and insignificant activities not specifically represented above.

<sup>7</sup> Concentrator and RTO efficiency conservatively assumed to be 90%.

<sup>8</sup> GP polyester resin emissions are not controlled by the RC/RTO.

**\* Disclaimer: material usage quantities and characteristics reflected in this table are presented for demonstration purposes only. Latham Pool Products requires the operational flexibility to allow for the use of a wide array of materials (and an associated wide range of material characteristics) that affect both the structural and aesthetic characteristics of the diverse shapes, sizes, styles, colors and finishes of numerous brands the company currently controls and provides based on market demand.**



**Table N-1B**  
**\*Maximum Allowable VOC Emissions, No Bypass<sup>5,6</sup>**  
**Latham Pool Products, Inc. d/b/a Viking Pools-WV**  
**Jane Lew, WV**

<b>Material<sup>1,2</sup></b>	<b>Neat Basis Annual Usage<sup>3</sup> (ton/yr)</b>	<b>VOC Content<sup>2</sup> (lb/ton)</b>	<b>Annual Controlled VOC Emissions (ton/yr)</b>
<b>EU-1B - Pool Manufacturing</b>			
Gelcoat <sup>1</sup>	594	532	15.8
Vinyl ester resin	1,616	109	8.8
GP polyester resin <sup>8</sup>	3,547	79	140.1
Catalyst (MEKP) <sup>4</sup>	115	14	0.1
<b>Pool Fabrication Total</b>		<b>Total =</b>	<b>164.8</b>

**Notes:**

<sup>1</sup> For certain product brands, clear gelcoat can be applied as a filled gelcoat that can contain up to 5% acrylic flake (as applied).

<sup>2</sup> VOC contents are based on the ACMA Unified Emission Factors for styrene and methyl methacrylate for the materials represented above. Vinyl ester resin contains minor amounts of vinyl toluene, which is a VOC and is emitted at the same rate as styrene. Clear gelcoat VOC content has been used as a conservative surrogate for all gelcoats.

<sup>3</sup> Based on average material usage proportions from BOMs for a Corinthian 2020 Ocean Blue pool.

<sup>4</sup> Total Annual VOC Emissions include methyl ethyl ketone emissions from catalyst usage. Methyl ethyl ketone peroxide catalyst (MEKP) is added at the ratio of up to 2% of the mass of gelcoat and resin applied. MEKP contains 2% MEK (a VOC), which is emitted during gelcoat/resin application and curing. MEKP also contains dimethyl phthalate (DMP, a VOC and a HAP), which is emitted in negligible quantities.

<sup>5</sup> HAP content has been conservatively assumed to be equal to VOC content.

<sup>6</sup> Includes VOC and HAP emission allocations for exempt and insignificant activities not specifically represented above.

<sup>7</sup> Concentrator and RTO efficiency conservatively assumed to be 90%.

<sup>8</sup> GP polyester resin emissions are not controlled by the RC/RTO.

<sup>9</sup> See Table N-3 Combustion Emissions

**\* Disclaimer: material usage quantities and characteristics reflected in this table are presented for demonstration purposes only. Latham Pool Products requires the operational flexibility to allow for the use of a wide array of materials (and an associated wide range of material characteristics) that affect both the structural and aesthetic characteristics of the diverse shapes, sizes, styles, colors and finishes of numerous brands the company currently controls and provides based on market demand.**

**Table N-2**  
**PM Emissions Calculations**  
**Latham Pool Products, Inc. d/b/a Viking Pools-WV**  
**Jane Lew, WV**

	[A]	[B]		[C]		[D]	[E]
Material	Estimated Aggregated Annual Raw Material Usage (tons)	Maximum Solids Content (%) <sup>2</sup>	Total Solids (tons)	Deposition Efficiency <sup>1</sup>	Pre-filter PM Emissions (ton/yr)	Filter Efficiency	Post- filter PM Emissions (ton/yr) <sup>3</sup>
EU-1B - Pool Manufacturing							
Gelcoat	594	70%	416	95%	21	98.0%	0.42
Vinyl ester resin	1,616	54%	873		44		0.87
GP polyester resin	3,547	66%	2,341		117		2.34
EU-1B Total =							3.63

**Notes:**

Post-filter PM Emissions are calculated as follows:  $[E] = [A] \times [B] \times (1 - [C]) \times (1 - [D])$

<sup>1</sup> Draft Guide to the Estimation and Permitting of Particulate Emissions from the Manufacture of Reinforced Plastic Composites - August 2001 - ECRM

Deposition efficiency is the amount of material sprayed that is transferred to the mold (90%), plus the fraction of "over-spray" that ends up on ends depositing on other plant surfaces (i.e., 50% of over-spray); the remainder of the solids are assumed to ends up being dispersed as an aerosol and captured by the filter.

<sup>2</sup> Highest gelcoat/resin solids content used for emission calculations.

Gelcoat solids content = 70%

Vinyl Ester Resin solids content = 54%

GP Polyester Resin solids content = 66%

<sup>3</sup> Assume PM10 = PM emissions (reference Chemical Engineering Handbook, Perry & Chilton, figure 20-92, paint pigment particle size)

**Table N-3**  
**Combustion Emissions for RTO**  
**Latham Pool Products, Inc. d/b/a Viking Pools-WV**  
**Jane Lew, WV**

<b>Substance</b>	<b>Emission Factor<sup>3</sup> (lb/10<sup>6</sup> scf)</b>	<b>Emissions<sup>4,5,6</sup> (ton/yr)</b>
Nitrogen oxides (as NO <sub>2</sub> ) <sup>1</sup>	1.00E+02	4.29E-01
Carbon monoxide <sup>1</sup>	8.40E+01	3.61E-01
Lead	5.00E-04	2.15E-06
Nitrous oxide	2.20E+00	9.45E-03
PM (total) <sup>2</sup>	7.60E+00	3.26E-02
Sulfur dioxide	6.00E-01	2.58E-03
VOC	5.50E+00	2.36E-02
Total HAP <sup>7</sup>	-	4.86E-02

**Notes:**

<sup>1</sup> AP-42 Table 1.4-1 emission factor for small boilers, uncontrolled.

<sup>2</sup> PM emission from natural gas combustion is smaller than 1.0 micron, so the same emission factor is used for PM, PM10, and PM2.5.

<sup>3</sup> Emission factors from AP-42 Chapter 1.4.

<sup>4</sup> 1020 MMBTU = 10<sup>6</sup> scf of natural gas per AP-42 1.4

<sup>5</sup> RTO Heat Rating: 1.00 mmbtu/hr  
1.00E-03 mmcf/hr

NG CF=1000Btu per equipment specification

<sup>6</sup> Hours of operation per year: 8,760

8,760 hours of operation is the worst-case estimate.

<sup>7</sup> Total HAP emissions is the sum of single HAPs with emission factors found in AP-42 Table 1.4-1.

**Table N-4**  
**Maximum Annual Criteria Pollutant Emissions**

<b>Criteria Pollutant</b>	<b>Maximum Annual Emissions (tons/yr)</b>			
	<b>EU-1A Mold Fab.</b>	<b>EU-1B Mfr. Process</b>	<b>EU-02 Finishing</b>	<b>Source Total</b>
VOC	12.6	164.8	0.7	178.1
PM/PM10	0.95	3.6	2.0	6.6

**Notes:**

Please note that there will be no changes to EU-1A emissions and EU-02 emissions, and as such calculation tables for those values have not been included in this application.

Based on the general nature of open molding operations conducted, VOC emissions from EU-1A and EU-1B will be comprised primarily of styrene, and to a lesser degree methyl methacrylate.

Does not include the negligible levels of emissions from Table N-3.

**Attachment P**  
**Affidavit of Publication**

**AIR QUALITY PERMIT NOTICE**  
**Notice of Application**  
***Proforma***

Notice is given that Latham Pools Products, Inc. (d/b/a Viking Pools – WV) has applied to the West Virginia Department of Environmental Protection, Division of Air Quality (DAQ), for a permit amendment for a fiberglass pool manufacturing operation located at 176 Viking Drive, in Jane Lew, in Lewis County, West Virginia.

Latham is requesting three anticipated facility and operational changes to be reflected in modified Reg. 13 and Reg. 30 permits.

1. Latham intends to construct a curing room, which will adjoin the Pool Production building. There will essentially be no emissions attributable to the new curing room.
2. A rotary concentrator and regenerative thermal oxidizer (RC-RTO) will be installed to abate VOC emissions from gelcoat and vinyl ester resin application for EU-1B (Pool Production). General purpose polyester resin emissions will not be controlled by the new RC-RTO. This will require the construction of a dividing wall within the Pool Production Building to allow such emissions to be separately captured. There will be no net change in EU-1B and facility-wide VOC emission limits.

Particulate matter emissions from pool production will increase by approximately 0.43 tpy, and negligible increases in NO<sub>x</sub> and CO emissions will occur from natural gas combustion in the RC-RTO.

Latham is not requesting changes to emission limits for the Mold Shop Building.

The facility is currently operating. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57<sup>th</sup> Street SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

By: Latham Pools Products, Inc. (d/b/a Viking Pools – WV)  
Rick Knicely  
General Manager  
176 Viking Drive  
Jane Lew, WV 26378

**Attachment S**  
**Title V Permit Revision Information**

## Attachment S

### Title V Permit Revision Information

#### 1. New Applicable Requirements Summary

Mark all applicable requirements associated with the changes involved with this permit revision:

<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqs.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) <sup>(1)</sup>
<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program EGUs (45CSR26)

<sup>(1)</sup> If this box is checked, please include **Compliance Assurance Monitoring (CAM) Form(s)** for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:

#### 2. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

☐ **Permit Shield Requested** *(not applicable to Minor Modifications)*



All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

### 3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? ☒ Yes ☐ No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

**A rotary concentrator and regenerative thermal oxidizer (RC-RTO) will be installed to abate VOC emissions from gelcoat and VE resin application in EU-1B.**

**As the Reg 30 permit is being revised, no redline will be attached. Latham wants permit language to reflect the installation of the RC-RTO that is flexible to their operational and economic needs.**

**A redline of the current Reg 13 permit will not be attached due to the nature of the requested changes. Latham wants permit language to reflect the installation of the RC-RTO that is flexible to their operational and economic needs.**

### 4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-2332G	11/09 /2020	
R30-04100045-2017(MM01)	06/30/2020	
	/ /	

### 5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

### 6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
See Attachment N, Table N-5 for facility emissions.	

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

**7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)**

**Note:** *This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed):

Matt Rowe  
(Please use blue ink)

Date:

11 / 19 / 2020  
(Please use blue ink)

Named (typed):

Matt Rowe

Title:

VP of EHS/Quality/Autocovers

**Note: Please check if the following included (if applicable):**

- |                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Compliance Assurance Monitoring Form(s) |
| <input type="checkbox"/> | Suggested Title V Draft Permit Language |

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*